

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

JASJIT GOTRA, *et al.*,

Defendants.

Case No. 1:18-CV-10548 (GAO)

**PLAINTIFF FTC'S MOTION FOR A
STAY IN LIGHT OF UNITED STATES
GOVERNMENT CESSATION**

The Federal Trade Commission ("FTC" or "Commission") hereby moves for a temporary stay in this case. In support of this motion, counsel for the FTC states as follows:

1. At the end of the day on December 21, 2018, appropriations for the FTC expired. The FTC had sufficient carryover funds to continue operating through midnight on December 28. After that, the agency lacks appropriated funding, and does not know when funding will be restored.

2. Absent an appropriation, FTC attorneys are prohibited from working, even on a voluntary basis, "except for emergencies involving the safety of human life or the protection of property." 31 U.S.C. § 1342.

3. Undersigned counsel for the FTC therefore requests that the Court stay all deadlines in this case until Congress has restored appropriations to the FTC.

a4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the FTC. The Commission requests that, at that point, all current deadlines for the parties be extended commensurate with the duration of the lapse in appropriations.

5. Opposing counsel for Alliance Security Inc. has authorized counsel for the FTC to state that Alliance Security has no objection to this motion. The FTC contacted Jasjit Gotra (who is

pro se) but has not received a response. The remaining Defendants have reached tentative settlements with the FTC (which are before the Court), and are no longer litigating this matter.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the FTC hereby moves for in this case until FTC attorneys are permitted to resume their usual civil litigation function

Date: December 31, 2018

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on December 31, 2018, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on counsel for Defendant Alliance Security Inc.

The remaining parties to this litigation are being served via email and U.S. mail as follows:

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